

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
WILKES-BARRE DIVISION

IN RE: : Case No.: 5:24-00067 (MJC)  
: Chapter 13  
TERRENCE JAMES DELANEY :  
Debtor(s) :  
: :  
CREDIT ACCEPTANCE CORPORATION :  
Movant :  
v. :  
TERRENCE JAMES DELANEY :  
Respondent(s) :  
JACK N. ZAHAROPOULOS :  
Trustee :

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
FILED BY CREDIT ACCEPTANCE CORPORATION**

1. Admitted.
2. Denied. A legal conclusion to which no response is required.
3. Admitted in part and denied in part. It is admitted that on November 24, 2023, the Debtor entered into a retail installment sales contract for the purchase of a 2016 BMW 320xi.  
  
The remaining allegations are denied as after reasonable investigation Debtor does not have knowledge sufficient to answer these allegations.
4. A. Admitted  
  
B. Admitted.  
  
C. Denied. After reasonable investigation Debtor does not have knowledge sufficient to answer this allegation.  
  
D. Denied. After reasonable investigation Debtor does not have knowledge sufficient to answer this allegation.
5. Denied. A legal conclusion to which no response is required.

WHEREFORE, Debtor requests the Court deny the Motion for Relief.

Respectfully Submitted,

**NEWMAN WILLIAMS, P.C.**

By: /s/ Robert J. Kidwell  
Robert J. Kidwell, Esquire  
Attorney for Debtor